
In The
SUPREME COURT OF THE UNITED STATES
October Term 2019

William T. Schmitt, Chad Thompson, and Debbie Blewitt,
Applicants/Petitioners,

v.

Frank LaRose, Ohio Secretary of State,
Respondent.

Application for an Extension of Time Within
Which to File a Petition for a Writ of Certiorari to the
United States Court of Appeals for the Sixth Circuit

APPLICATION TO THE HONORABLE JUSTICE
SONIA SOTOMAYOR AS CIRCUIT JUSTICE

JEFFREY T. GREEN
SIDLEY AUSTIN LLP
1501 K Street, N.W.
Washington, D.C. 20005
(202) 736-8000

NAOMI A. IGRA
STEPHEN CHANG
SIDLEY AUSTIN LLP
555 California Street
San Francisco, CA 94104
(415) 772-1200

SARAH O'ROURKE SCHRUP
NORTHWESTERN SUPREME
COURT PRACTICUM
375 East Chicago Avenue
Chicago, IL 60611
(312) 503-0063

November 7, 2019

MARK R. BROWN*
CAPITAL UNIVERSITY LAW SCHOOL
303 E. Broad Street
Columbus, OH 43215
(614) 236-6590
mbrown@law.capital.edu

MARK G. KAFANTARIS
KAFANTARIS LAW OFFICES
625 City Park Avenue
Columbus, OH 43206
(614) 223-1444

Attorneys for Applicants/Petitioners
***Counsel of Record**

APPLICATION FOR AN EXTENSION OF TIME

Pursuant to Rule 13.5 of the Rules of this Court, Applicants William T. Schmitt, Chad Thompson, and Debbie Blewitt hereby request a 60-day extension of time within which to file a petition for a writ of certiorari up to and including Monday, February 1, 2020.

JUDGMENT FOR WHICH REVIEW IS SOUGHT

The judgment for which review is sought is *William T. Schmitt, et al. v. Frank LaRose*, No. 19-3196 (6th Cir. August 7, 2019) (attached as Exhibit 1). The Sixth Circuit Court of Appeals denied Applicants' petition for rehearing en banc on September 4, 2019 (attached as Exhibit 2).

JURISDICTION

This Court will have jurisdiction over any timely filed petition for certiorari in this case pursuant to 28 U.S.C. § 1254(1). Under Rules 13.1, 13.3, and 30.1 of the Rules of this Court, a petition for a writ of certiorari was due to be filed on or before December 3, 2019. In accordance with Rule 13.5, this application is being filed more than 10 days in advance of the filing date for the petition for a writ of certiorari.

REASONS JUSTIFYING AN EXTENSION OF TIME

Applicants respectfully request a 60-day extension of time within which to file a petition for a writ of certiorari seeking review of the decision of the Sixth Circuit Court of Appeals in this case, up to and including February 1, 2020.

1. Applicants have requested that the Northwestern University School of Law Supreme Court Practicum assist in the preparation of their petition. An

extension of time will permit the students the time necessary to complete a cogent and well-researched petition after the beginning of the academic calendar for spring 2020, which begins January 13, 2020.

2. The extension of time is also necessary because of the press of other client business. For example, in the coming months, the Northwestern Practicum has several overlapping commitments representing other clients in this Court, including petitions for writs of certiorari in *Ackies v. United States*, No.19A234, due November 11, 2019; *Clay v. United States*, No. 19A326, due December 5, 2019; and *Beers v. United States*, No. 17-3010 (3d Cir.), due December 10, 2019. The Northwestern Practicum also has reply briefs in support of a petition for writ of certiorari in *Richards v. Donovan*, No. 19-55, due December 5, 2019; *Faircloth v. United States*, No. 19-6249, due November 27, 2019; *Vereen v. United States*, No. 19-6405, due December 9, 2019; and a reply brief on the merits in *Shular v. United States*, No. 18-6662, due December 20, 2019.

3. A 60-day extension for the Applicants would provide the Northwestern Practicum students sufficient time for research and drafting efforts per Applicants' request.

CONCLUSION

For the foregoing reasons, Applicants respectfully request that this Court grant an extension of 60 days, up to and including February 1, 2020, within which to file a petition for a writ of certiorari in this case.

Respectfully submitted,



NAOMI A. IGRA
STEPHEN CHANG
SIDLEY AUSTIN LLP
555 California Street
San Francisco, CA 94104
(415) 772-1200

SARAH O'ROURKE SCHRUP
NORTHWESTERN SUPREME
COURT PRACTICUM
375 East Chicago Avenue
Chicago, IL 60611

JEFFREY T. GREEN
SIDLEY AUSTIN LLP
1501 K Street, N.W.
Washington, D.C. 20005
(202) 736-8000

MARK R. BROWN*
CAPITAL UNIVERSITY LAW SCHOOL
303 E. Broad Street
Columbus, OH 43215
(614) 236-6590
mbrown@law.capital.edu

MARK KAFANTARIS
KAFANTARIS LAW OFFICES
625 City Park Avenue
Columbus, OH 43206
(614) 223-1444

November 7, 2019

Attorneys for Applicants/Petitioners
*Counsel of Record